

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

FILED/REC'D

2023 OCT 11 P 12:03

UNITED STATES OF AMERICA

SUPERSEDING INDICTMENT

v.

CLERK OF COURT  
U.S. DISTRICT COURT  
WD OF WI

Case No. 23-cr-22-wmc

18 U.S.C. § 1956(h)

18 U.S.C. § 1956(a)(1)(B)(i)

PAUL WILLIAMS ANTI,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

1. From on or before September 15, 2020, to on or about March 13, 2023,  
in the Western District of Wisconsin and elsewhere, the defendant,

PAUL WILLIAMS ANTI,

knowingly and intentionally conspired with others known and unknown to the grand  
jury to violate Title 18, United States Code, Section 1956(a)(1)(B)(i).

2. Specifically, the defendant conspired with others to knowingly conduct  
financial transactions affecting interstate commerce and foreign commerce, which  
transactions involved the proceeds of specified unlawful activity, that is wire fraud,  
knowing that the transactions were designed in whole or in part to conceal and disguise  
the nature, location, source, ownership, and control of the proceeds of the specified  
unlawful activity, and that while conducting and attempting to conduct such financial  
transactions, knew that the property involved in the financial transactions represented  
the proceeds of some form of unlawful activity.

3. It was part of the conspiracy that between on or about October 13, 2020, and on or about October 20, 2020, unknown fraud perpetrators used false pretenses to cause an employee of an organization in the Western District of Wisconsin (Organization A) to wire transfer the organization's funds to coconspirators including the defendant.

4. It was part of the conspiracy that defendant controlled the following bank accounts, each of which he opened using a false name and fraudulent identification information:

Bank Name	Fictitious Account Holder	Last Four of Account No.
Wells Fargo	G.P., dba Electronics General Goods	(0229)
Citizens Bank	G.P., dba Gary Ventures	(1157)

5. It was part of the conspiracy that on or before October 13, 2020, fraud perpetrators gained unauthorized access to the work email account of an employee of Organization A. Using their unauthorized access and without the employee's knowledge, fraud perpetrators obtained copies of incoming emails containing genuine invoices sent to the organization for payment. The fraud perpetrators altered the genuine invoices to increase the amounts due and changed where payment was to be directed.

6. It was further part of the conspiracy that, using their covert control over the employee's email account, fraud perpetrators sent emails containing the altered invoices to a second employee for payment. Not knowing the invoices had been altered

and believing that the first employee had approved the invoices for payment, the second employee directed the organization's bank to wire funds to bank accounts actually controlled by the defendant and other coconspirators, in accordance with the altered invoice's payment instructions.

7. It was further part of the conspiracy that on October 19, 2020, after receiving an altered invoice with the fraudulent payee and balance due information, Organization A caused the invoice balance due of \$605,200 to be wire transferred from Organization A's bank account in Madison, Wisconsin, to the Wells Fargo account controlled by the defendant in the name of "G.P., dba Electronics General Goods" in Bloomfield, Connecticut.

8. It was further part of the conspiracy that once \$605,200 of Organization A's funds were wire transferred to the Wells Fargo account controlled by the defendant, the defendant, misrepresenting himself as "G.P.," immediately conducted financial transactions to further direct some of fraud proceeds to other bank accounts he maintained under false identities. These accounts included another account in the name of "G.P., dba Gary Ventures," an account in the name of "C.F. /Fowler Ventures," and an account in the name of "J.F."

9. During the time-period of the conspiracy, the defendant was employed as a health care worker under the false name K.A. The defendant directed mailings associated with his money laundering activities to the mailbox of an elderly patient he was caring for at a Connecticut nursing home. For example, defendant directed bank mailings associated with the two bank accounts named in paragraph 4 of the indictment

to his patient's mailbox. The defendant retrieved the mailings when he picked up the patient's mail.

10. It was a further part of the conspiracy that between October 21, 2020, and March 13, 2023, defendant continued to open and maintain bank accounts using false identities, including those of "G.P.", "C.F.", and "J.F." These accounts were used to collect and distribute wire fraud proceeds from victims in New York and Missouri.

11. The defendant's actions were designed to conceal the source, control, ownership, and location of proceeds that were derived from wire fraud-schemes. The defendant's actions were also designed to help conceal his true identity and avoid detection.

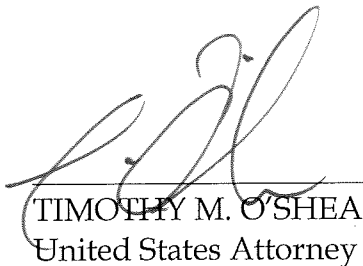
(All in violation of Title 18, United States Code, Section 1956(h)).

A TRUE BILL



PRESIDING JUROR

Indictment returned: 10/11/2023



TIMOTHY M. O'SHEA  
United States Attorney